

# FUNDING COMMITMENT REPORT

Form 471 Application Number. 207111

Funding Request Number: 729963 Funding Status: Not Funded  
 SPIN: 143002586 Service Provider Name: CenturyTel of Wyoming, Inc.  
 Contract Number: SEA-980106-2601  
 Services Ordered: Telecommunications Service  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142569  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$15,002.40  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitment Decision: \$0.00 - 28 Day Waiting Period Violated  
 Funding Commitment Decision Explanation: A contract? for a new service was signed prior to the required 28-day waiting period computed from the date of the posting of the Form 470 to the SLD Web Site

Funding Request Number: 729964 Funding Status: Not Funded  
 SPIN: 143002585 Service Provider Name: Union Tel, Co.  
 Contract Number: SEA-980106-2601  
 Services Ordered: Telecommunications Service  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142569  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$15,002.40  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitment Decision: \$0.00 - 28 Day Waiting Period Violated  
 Funding Commitment Decision Explanation: A contract? for a new service was signed prior to the required 28-day waiting period computed from the date of the posting of the Form 470 to the SLD Web Site.

Funding Request Number: 729965 Funding Status: Not Funded  
 SPIN: 143005231 Service Provider Name: Qwest Corporation fka US West Communications  
 Contract Number: SEA-980106-2601  
 Services Ordered: Telecommunications Service  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142550  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$36,892.20  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitment Decision: \$8.00 - 28 Day Waiting Period Violated  
 Funding Commitment Decision Explanation: A contract? for a new service was signed prior to the required 28-day waiting period computed from the date of the posting of the Form 470 to the SLD Web Site.

Funding Request Number: 729966 Funding Status: Not Funded  
 SPIN: 143005231 Service Provider Name: Qwest Corporation fka US West Communications  
 Contract Number: SEA-980106-2601  
 Services Ordered: Telecommunications Service  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142550  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$5,054.28  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitment Decision: \$8.00 - 28 Day Waiting Period Violated  
 Funding Commitment Decision Explanation: A contract? for a new service was signed prior to the required 28-day waiting period computed from the date of the posting of the Form 470 to the SLD Web Site.

# FUNDING COMMITMENT REPORT

Form 471 Application Number: 202111

Funding Request Number: 729967 Funding Status: Not Funded  
 SPIN: 143000132 Service Provider Name: Qwest Interprise America, Inc. fka US West Interpr  
 Contract Number: SEA-980106-2601  
 Services Ordered: Internal Connections  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142550  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$33,204.00  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitmen? Decision: \$0.00 - 28 Day Waiting Period Violated  
 Funding Commitment Decision Explanation: Funding cap will not rovide for Internal  
 Connections < 82% discount to be funded. Please see WWW.SL.UN?VERSALSERVICE.ORG for  
 further details.

Funding Request Number: 729968 Funding Status: Not Funded  
 SPIN: 143000132 Service Provider Name: Qwest Interprise America, Inc. fka US West Interpr  
 Contract Number: SEA-980106-2601  
 Services Ordered: Internal Connections  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142550  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$689.28  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitment Decision: \$0.00 - Srvc/Discnt will NOT be funded  
 Funding Commitment Decision Explanation: Funding cap will not provide for Internal  
 Connections < 82% discount to be funded. Please see WWW.SL.UNIVERSALSERVICE.ORG for  
 further details.

Funding Request Number: 729969 Funding Status: Not Funded  
 SPIN: 143000132 Service Provider Name: Qwest Interprise America, Inc. fka US West Interpr  
 Contract Number: SEA-980106-2601  
 Services Ordered: Internal Connections  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142550  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$40,884.48  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitment Decision: \$0.00 - Srvc/Discnt will NOT be funded  
 Funding Commitment Decision Explanation: Funding cap will not provide for Internal  
 Connections < 82% discount to be funded. Please see WWW.SL.UNIVERSALSERVICE.ORG for  
 further details.

Funding Request Number: 729970 Funding Status: Not Funded  
 SPIN: 143000132 Service Provider Name: Qwest Interprise America, Inc. fka US West Interpr  
 Contract Number: SEA-980106-2601  
 Services Ordered: Internet Access  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142550  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$6,164.16  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitmen? Decision: \$0.00 - 28 Day Waitin Period Violated  
 Funding Commitment Decision Explanation: A contrac? for a new service was signed  
 prior to the required 28-day waiting period computed from the date of the posting of  
 the Form 470 to the SLD Web Site.

# FUNDING COMMITMENT REPORT

Form 471 Application Number: 202111

Funding Request Number: 729971 Funding Status: Not Funded  
 SPIN: 143002586 Service Provider Name: CenturyTel of Wyoming, Inc.  
 Contract Number: SEA-980106-2601  
 Services Ordered: Telecommunications Service  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142550  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$3,935.40  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitment Decision: \$8.00 - 28 Day Waiting Period Violated  
 Funding Commitment Decision Explanation: A contract for a new service was signed prior to the required 28-day waiting period computed from the date of the posting of the Form 470 to the SLD Web Site

Funding Request Number: 729972 Funding Status: Not Funded  
 SPIN: 123005231 Service Provider Name: Qwest Corporation fka US West Communications  
 Contract Number: SEA-980106-2601  
 Services Ordered: Telecommunications Service  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142564  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$55,404.36  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitment Decision: \$8.00 - 28 Day Waiting Period Violated  
 Funding Commitment Decision Explanation: A contract for a new service was signed prior to the required 28-day waiting period computed from the date of the posting of the Form 470 to the SLD Web Site.

Funding Request Number: 729976 Funding Status: Not Funded  
 SPIN: 143005231 Service Provider Name: Qwest Corporation fka US West Communications  
 Contract Number: SEA-980106-2601  
 Services Ordered: Telecommunications Service  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142564  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$4,279.44  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitment Decision: \$8.00 - 28 Day Waiting Period Violated  
 Funding Commitment Decision Explanation: A contract for a new service was signed prior to the required 28-day waiting period computed from the date of the posting of the Form 470 to the SLD Web Site.

Funding Request Number: 729971 Funding Status: Not Funded  
 SPIN: 143000132 Service Provider Name: Qwest Enterprise America, Inc. fka US West Inter  
 Contract Number: SEA-980106-2601  
 Services Ordered: Internal Connections  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142564  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$17,004.00  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitment Decision: \$0.00 - Svc Discnt will NOT be funded  
 Funding Commitment Decision Explanation: funding cap will not provide for Internal Connections < 82% discount to be funded. Please see WWW.SL.UNIVERSALSERVICE.ORG for further details.

# FUNDING COMMITMENT REPORT

Form 471 Application Number: 202111

Funding Request Number: 729978 Funding Status: Not Funded  
 SPIN: 143000132 Service Provider Name: Qwest Interprise America, Inc. fka US West Inter  
 Contract Number: SEA-980106-2601  
 Services Ordered: Internal Connections  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142564  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$623.61  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitment Decision: \$0.00 - Srvce/Discount will NOT be funded  
 Funding Commitment Decision Explanation: Funding cap will not provide for Internal  
 Connections < 82% discount to be funded. Please see WWW.SL.UNIVERSALSERVICE.ORG for  
 further details.

Funding Request Number: 729979 Funding Status: Not Funded  
 SPIN: 143000132 Service Provider Name: Qwest Interprise America, Inc. fka US West Inter  
 Contract Number: SEA-980106-2601  
 Services Ordered: Internal Connections  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142564  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$14,127.72  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitment Decision: \$0.00 - Srvce/Discount will NOT be funded  
 Funding Commitment Decision Explanation: Funding cap will not provide for Internal  
 Connections < 82% discount to be funded. Please see WWW.SL.UNIVERSALSERVICE.ORG for  
 further details.

Funding Request Number: 729980 Funding Status: Not Funded  
 SPIN: 143002525 Service Provider Name: Silver Star Telephone Co., Inc  
 Contract Number: SEA-980106-2601  
 Services Ordered: Telecommunications Service  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142564  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$5,602.80  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitment Decision: \$8.00 - 28 Day Waiting Period Violated  
 Funding Commitment Decision Explanation: A contract for a new service was signed  
 prior to the required 28-day waiting period computed from the date of the posting of  
 the Form 470 to the SLD Web Site

Funding Request Number: 729981 Funding Status: Not Funded  
 SPIN: 143005231 Service Provider Name: Qwest Corporation fka US West Communications  
 Contract Number: SEA-980106-2601  
 Services Ordered: Telecommunications Service  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142555  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$19,503.84  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitment Decision: \$8.00 - 28 Day Waiting Period Violated  
 Funding Commitment Decision Explanation: A contract for a new service was signed  
 prior to the required 28-day waiting period computed from the date of the posting of  
 the Form 470 to the SLD Web Site.

# FUNDING COMMITMENT REPORT

Form 471 Application Number: 202111

Funding Request Number: 729982 Funding Status: Not Funded  
 SPIN: 143005231 Service Provider Name: Qwest Corporation fka US West Communications  
 Contract Number: SEA-980106-2601  
 Services Ordered: Telecommunications Service  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142555  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$3,369.48  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitment Decision: \$8.00 - 28 Day Waiting Period Violated  
 Funding Commitment Decision Explanation: A contract for a new service was signed prior to the required 28-day waiting period computed from the date of the posting of the Form 470 to the SLD Web Site.

Funding Request Number: 729983 Funding Status: Not Funded  
 SPIN: 143000132 Service Provider Name: Qwest Interprise America, Inc. fka US West Interp  
 Contract Number: SEA-980106-2601  
 Services Ordered: Internal Connections  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142555  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$3,102.00  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitment Decision: \$0.00 - Srvc/Discount will NOT be funded  
 Funding Commitment Decision Explanation: Funding cap will not provide for Internal Connections < 82% discount to be funded. Please see WWW.SL.UN?VERSALSERVICE.ORG for further details.

Funding Request Number: 729984 Funding Status: Not Funded  
 SPIN: 143000132 Service Provider Name: Qwest Interprise America, Inc. fka US West Interp  
 Contract Number: SEA-980106-2601  
 Services Ordered: Internal Connections  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142555  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$459.48  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitment Decision: \$0.00 - Srvc/Discount will NOT be funded  
 Funding Commitment Decision Explanation: Funding cap will not provide for Internal Connections < 82% discount to be funded. Please see WWW.SL.UNIVERSALSERVICE.ORG for further details.

Funding Request Number: 729985 Funding Status: Not Funded  
 SPIN: 143000132 Service Provider Name: Qwest Interprise America, Inc. fka US West Interp  
 Contract Number: SEA-980106-2601  
 Services Ordered: Internal Connections  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142555  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$8,159.40  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitment Decision: \$8.00 - Srvc/Discount will NOT be funded  
 Funding Commitment Decision Explanation: Funding cap will not provide for Internal Connections < 82% discount to be funded. Please see WWW.SL.UN?VERSALSERVICE.ORG for further details.

# FUNDING COMMITMENT REPORT

Form 471 Application Number: 20211:

Funding Request Number: 729986 Funding Status: Not Funded  
 SPIN: 143000132 Service Provider Name: Qwest Interprise America, Inc. fka US West Interp  
 Contract Number: SEA-980106-2601  
 Services Ordered: Internet Access  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142555  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$4,593.60  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitment Decision: \$8.00 - 28 Day Waiting Period Violated  
 Funding Commitment Decision Explanation: A contract for a new service was signed prior to the required 28-day waiting period computed from the date of the posting of the Form 470 to the SLD Web Site.

Funding Request Number: 729987 Funding Status: Not Funded  
 SPIN: 143005231 Service Provider Name: Qwest Corporation fka US West Communications  
 Contract Number: SEA-980106-2601  
 Services Ordered: Telecommunications Service  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142560  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$10,625.64  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitment Decision: \$8.00 - 28 Day Waiting Period Violated  
 Funding Commitment Decision Explanation: A contract for a new service was signed prior to the required 28-day waiting period computed from the date of the posting of the Form 470 to the SLD Web Site.

Funding Request Number: 729988 Funding Status: Not Funded  
 SPIN: 143005231 Service Provider Name: Qwest Corporation fka US West Communications  
 Contract Number: SEA-980106-2601  
 Services Ordered: Telecommunications Service  
 Earliest Possible Effective Date of Discount: 07/01/2300  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142560  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$722.04  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitment Decision: \$8.00 - 28 Day Waiting Period Violated  
 Funding Commitment Decision Explanation: A contract for a new service was signed prior to the required 28-day waiting period computed from the date of the posting of the Form 470 to the SLD Web Site.

Funding Request Number: 729989 Funding Status: Not Funded  
 SPIN: 143000132 Service Provider Name: Qwest Interprise America, Inc. fka US West Interp  
 Contract Number: SEA-980106-2601  
 Services Ordered: Internal Connections  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142560  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$6,702.00  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitment Decision: \$0.00 - Svc/Discount will NOT be funded  
 Funding Commitment Decision Explanation: Funding cap will not provide for Internal Connections < 82% discount to be funded. Please see WWW.SL.UNIVERSALSERVICE.ORG for further details.

# FUNDING COMMITMENT REPORT

Form 471 Application Number: 202111

Funding Request Number: 729990 Funding Status: Not Funded  
 SPIN: 143000132 Service Provider Name: Qwest Interprise America, Inc. fka US West Interp  
 Contract Number: SEA-980106-2601  
 Services Ordered: Internal Connections  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142560  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$98.52  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitmen? Decision: \$0.00 - Srvc Discnt will NOT be funded  
 Funding Commitment Decision Explanation: kunding cap will not provide for Internal  
 Connections < 82% discount to be funded. Please see WWW.SL.UNIVERSALSERVICE.ORG for  
 further details.

Funding Request Number: 729991 Funding Status: Not Funded  
 SPIN: 143000132 Service Provider Name: Qwest Interprise America, Inc. fka US West Interp  
 Contract Number: SEA-980106-2601  
 Services Ordered: Internal Connections  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142560  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$10,724.64  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitment Decision: \$0.00 - Srvc/Discnt will NOT be funded  
 Funding Commitment Decision Explanation: Funding cap will not provide for Internal  
 Connections < 82% discount to be funded. Please see WWW.SL.UNIVERSALSERVICE.ORG for  
 further details.

Fundin Re uest Number: 729992 Funding Status: Not Funded  
 SPIN: 743080132 Service Provider Name: Qwest Interprise America, Inc. fka US West Interp  
 Contract Number: SEA-980106-2601  
 Services Ordered: Internet Access  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142560  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$1,951.28  
 Discount Percentage Approved b the SLD: N/A  
 Funding Commitmen? Decision: \$8.00 - 28 Day Waitin Period Violated  
 Funding Commitment Decision Explanation: A contrac? for a new service was signed  
 prior to the required 28-day waiting period computed from the date of the posting of  
 the Form 470 to the SLD Web Site.

Funding Request Number: 729993 Funding Status: Not Funded  
 SPIN: 143002585 Service Provider Name: Union Tel. Co.  
 Contract Number: SEA-980106-2601  
 Services Ordered: Telecommunications Service  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142560  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$13,252.68  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitmen? Decision: \$0.00 - 28 Day Waitin Period Violated  
 Funding Commitment Decision Explanation: A contrac? for a new service was signed  
 prior to the required 28-day waiting period computed from the date of the posting of  
 the Form 470 to the SLD Web Site.

# FUNDING COMMITMENT REPORT

Form 471 Application Number: 202111

Funding Request Number: 729994 Funding Status: Not Funded  
 SPIN: 143005231 Service Provider Name: Qwest Corporation fka US West Communications  
 Contract Number: SEA-980106-2601  
 Services Ordered: Telecommunications Service  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142558  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$11,750.16  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitment Decision: \$0.00 - 28 Day Waiting Period Violated  
 Funding Commitment Decision Explanation: A contract for a new service was signed prior to the required 28-day waiting period computed from the date of the posting of the Form 470 to the SLD Web Site.

Funding Request Number: 729996 Funding Status: Not Funded  
 SPIN: 143005231 Service Provider Name: Qwest Corporation fka US West Communications  
 Contract Number: SEA-980106-2601  
 Services Ordered: Telecommunications Service  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142558  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$962.76  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitment Decision: \$8.00 - 28 Day Waiting Period Violated  
 Funding Commitment Decision Explanation: A contract for a new service was signed prior to the required 28-day waiting period computed from the date of the posting of the Form 470 to the SLD Web Site.

Funding Request Number: 729997 Funding Status: Not Funded  
 SPIN: 143000132 Service Provider Name: Qwest Interprise America, Inc. fka US West Inter  
 Contract Number: SEA-980106-2601  
 Services Ordered: Internal Connections  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142558  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$6,702.00  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitment Decision: \$0.00 - Srvce/Discount will NOT be funded  
 Funding Commitment Decision Explanation: Funding cap will not provide for Internal Connections < 82% discount to be funded. Please see WWW.SL.UNIVERSALSERVICE.ORG for further details.

Funding Request Number: 729998 Funding Status: Not Funded  
 SPIN: 1C3000132 Service Provider Name: Qwest Interprise America, Inc. fka US West Inter  
 Contract Number: SEA-980106-2601  
 Services Ordered: Internal Connections  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142558  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$131.28  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitment Decision: \$0.00 - Srvce/Discount will NOT be funded  
 Funding Commitment Decision Explanation: Funding cap will not provide for Internal Connections < 82% discount to be funded. Please see WWW.SL.UNIVERSALSERVICE.ORG for further details.



# FUNDING COMMITMENT REPORT

Fora 471 Application Number: 202111

Funding Request Number: 77399'3 Funding Status: Not Funded  
 SPIN: 143000132 Service Provider Name: Qwest Interprise America, Inc. fka US West Interpr  
 Contract Number: SEA-980106-2601  
 Services Ordered: Internal Connections  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142558  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$10,721.64  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitment Decision: \$8.00 - Srvcl Discount will NOT be funded  
 Funding Commitment Decision Explanation: Funding cap will not provide for Internal  
 Connections < 82% discount to be funded, Please see [WWW.SLD.UNIVERSALSERVICE.ORG](http://WWW.SLD.UNIVERSALSERVICE.ORG) for  
 further details

Funding Request Number: 730000 Funding Status: Not Funded  
 SPIN: 143000132 Service Provider Name: Qwest Interprise America, Inc. fka US West Interpr  
 Contract Number: SEA-980106-2601  
 Services Ordered: Internet Access  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142558  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$2,0k7.84  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitment Decision: \$8.00 - 28 Day Waitin Period Violated  
 Funding Commitment Decision Explanation: A contrac? for a new service was signed  
 prior to the required 28-day waiting period computed from the date of the posting of  
 the Form 470 to the SLD Web Site

Funding Request Number: 730001 Funding Status: Not Funded  
 SPIN: 143002585 Service Provider Name: Union Tel. Co.  
 Contract Number: SEA-980106-2601  
 Services Ordered: Telecommunications Service  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142558  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$11,624.52  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitment Decision: \$8.00 - 28 Day Waitin Period Violated  
 Funding Commitment Decision Explanation: A contrac? for a new service was signed  
 prior to the required 28-day waiting period computed from the date of the posting of  
 the Form 470 to the SLD Web Site.

Funding Request Number: 730002 Funding Status: Not Funded  
 SPIN: 143005231 Service Provider Name: Qwest Corporation fka US West Communications  
 Contract Number: SEA-980106-2601  
 Services Ordered: Telecommunications Service  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142495  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$15,711.24  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitment Decision: \$0.00 - 28 Day Waitin Period Violated  
 Funding Commitment Decision Explanation: A contrac? for a new service was signed  
 prior to the required 28-day waiting period computed from the date of the posting of  
 the Form 470 to the SLD Web Site.

# FUNDING COMMITMENT REPORT

Form 471 Application Number: 202111

Funding Request Number: 730003 Funding Status: Not Funded  
 SPIN: 143085231 Service Provider Name: Qwest Corporation fka US West Communications  
 Contract Number: SEA-980106-2601  
 Services Ordered: Telecommunications Service  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142495  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$13,010.76  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitment Decision: \$0.00 - 28 Day Waiting Period Violated  
 Funding Commitment Decision Explanation: A contract for a new service was signed prior to the required 26-day waiting period computed from the date of the posting of the Form 470 to the SLD Web Site.

Funding Request Number: 730004 Funding Status: Not Funded  
 SPIN: 143000132 Service Provider Name: Qwest Interprise America, Inc. fka US West Interp  
 Contract Number: SEA-980106-2601  
 Services Ordered: Internal Connections  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142495  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$10,302.00  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitment Decision: \$0.00 - Srvc/Disnt will NOT be funded  
 Funding Commitment Decision Explanation: Funding cap will not provide for Internal Connections < 82% discount to be funded. Please see WWW.SL.UNIVERSALSERVICE.ORG for further details

Funding Request Number: 730005 Funding Status: Not Funded  
 SPIN: 143000132 Service Provider Name: Qwest Interprise America, Inc. fka US West Interp  
 Contract Number: SEA-980106-2601  
 Services Ordered: Internal Connections  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142495  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$895.56  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitment Decision: \$0.00 - Srvc/Disnt will NOT be funded  
 Funding Commitment Decision Explanation: Funding cap will not provide for Internal Connections < 82% discount to be funded. Please see WWW.SL.UNIVERSALSERVICE.ORG for further details.

Funding Request Number: 730006 Funding Status: Not Funded  
 SPIN: 143000132 Service Provider Name: Qwest Interprise America, Inc. fka US West Interp  
 Contract Number: SEA-980106-2601  
 Services Ordered: Internal Connections  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142495  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$12,568.32  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitment Decision: \$8.00 - Srvc/Disnt will NOT be funded  
 Funding Commitment Decision Explanation: Funding cap will not provide for Internal Connections < 82% discount to be funded. Please see WWW.SL.UNIVERSALSERVICE.ORG for further details.

# FUNDING COMMITMENT REPORT

Form 471 Application Number: 202111

Funding Request Number: 730007 Funding Status: Not Funded  
 SPIN: 143000132 Service Provider Name: Qwest Interprise America, Inc. fka US West Interpr  
 Contract Number: SEA-980136-2601  
 Services Ordered: Internet Access  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142495  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$2,822.40  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitmen? Decision: \$0.00 - 28 Day Waitin Period Violated  
 Funding Commitment Decision Explanation: A contrac? for a new service was signed  
 prior to the required 28-day waiting period computed from the date of the posting of  
 the Form 470 to the SLD Web Site.

Funding Request Number: 730008 Funding Status: Not Funded  
 SPIN: 143002540 Service Provider Name: RT Communications, Inc.  
 Contract Number: SEA-980106-2601  
 Services Ordered: Telecommunications Service  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142895  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$8,975.40  
 Discount Percentaae Apporoved by the SLD: N/A  
 Funding Commitmenf Decision: \$0.00 - 28 Day Waitin Period Violated  
 Funding Commitment Decision Explanation: A contrac? for a new service was signed  
 prior to the required 28-day waiting period computed from the date of the posting of  
 the Form \$70 to the SLD Web Site.

Funding Request Number: 730009 Funding Status: Not Funded  
 SPIN: 143005231 Service Provider Name: Qwest Corporation fka US West Communications  
 Contract Number: SEA-980106-2601  
 Services Ordered: Telecommunications Service  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 182505  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$13,463.76  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitmen? Decision: \$6.00 - 28 Day Waitin Period Violated  
 Funding Commitment Decision Explanation: A contrac? for a new service was signed  
 prior to the required 28-day waiting period computed from the date of the posting of  
 the Form 470 to the SLD Web Site.

Funding Request Number: 730010 Funding Status: Not Funded  
 SPIN: 143005231 Service Provider Name: Qwest Corporation fka US West Communications  
 Contract Number: SEA-980106-2601  
 Services Ordered: Telecommunications Service  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142505  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$867.36  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitmen? Decision: \$8.00 - 28 Day Waitin Period Violated  
 Funding Commitment Decision Explanation: A contrac? for a new service was signed  
 prior to the required 28-day waiting period computed from the date of the posting of  
 the Form 470 to the SLD Web Site.

# FUNDING COPIMITMENT REPORT

Form 471 Application Number: 202111

Funding Request Number: 730011 Funding Status: Not Funded  
 SPIN: 143000132 Service Provider Name: Qwest Interprise America, Inc. fka US West Interp  
 Contract Number: SEA-980106-2601  
 Services Ordered: Internal Connections  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142505  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$3,102.00  
 Discount Percentaae Approved by the SLD: N/A  
 Funding Commitmenf Decision: \$0.00 - Srvc/Discnt will NOT be funded  
 Fundin? Commitment Decision Explanation: Funding cap will not rovide for Internal  
 Connec ions < 82% discount to be funded Please see WWW.SL UN?VERSALSERVICE.ORG for  
 further details.

Funding Request Number: 730012 Funding Status: Not Funded  
 SPIN: 143000132 Service Provider Name: Qwest Interprise America, Inc. fka US West Interp  
 Contract Number: SEA-980106-2601  
 Services Ordered: Internal Connections  
 Earliest Possible Effective Date of Dlscount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site identifier: 142505  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$59.76  
 Discount Percenta e Approved by the SLD: N/A  
 Funding Commitmen? Decision: \$0.00 - Srvc/Discent will NOT be funded  
 Funding Commitment Decision Explanation: Funding cap will not provide for Internal  
 Connections < 82% discount to be funded. Please see WWW.SL.UNIVERSALSERVICE.ORG for  
 further details.

Funding Request Number: 730013 Funding Status: Not Funded  
 SPIN: 143000132 Service Provider Name: Qwest Interprise America, Inc. fka US West Interp  
 Contract Number: SEA-980106-2601  
 Services Ordered: Internal Connections  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142505  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$8,285.16  
 Discount Percentaae Approved by the SLD: N/A  
 Funding Commitment Decision: \$0.00 - Srvc/Discent will NOT be funded  
 Funding Commitment Decision Explanation: Funding cap will not provide for Internal  
 Connections < 82% discount to be funded. Please see WWW.SL.UNIVERSALSERVICE.ORG for  
 further details.

Funding Request Number: 730011 Funding Status: Not Funded  
 SPIN: 143000132 Service Provider Name: Qwest Interprise America, Inc. fka US West Interp  
 Contract Number: SEA-980106-2601  
 Services Ordered: Internet Access  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142505  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$1,334.40  
 Discount Percenta e Approved b the SLD: N/A  
 Funding Commitmen? Decision: \$8.00 - 28 Day Waitin Period Violated  
 Funding Commitment Decision Explanation: A contrac? for a new service was signed  
 prior to the required 28-day waiting period computed from the date of the posting of  
 the Form 470 to the SLD Web Site.

# FUNDING COMMITMENT REPORT

Form 471 Application Number: 202111

Funding Request Number: 730015 Funding Status: Not Funded  
 SPIN: 143010285 Service Provider Name: Tri-County Telephone Association, inc.  
 Contract Number: SEA-980106-2601  
 Services Ordered: Telecommunications Service  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142505  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$1,919.76  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitment Decision: \$0.00 - 28 Day Waiting Period Violated  
 Funding Commitment Decision Explanation: A contract for a new service was signed prior to the required 28-day waiting period computed from the date of the posting of the Form 470 to the SLD Web Site.

Funding Request Number: 730016 Funding Status: Not Funded  
 SPIN: 143005231 Service Provider Name: Qwest Corporation fka US West Communications  
 Contract Number: SEA-980106-2601  
 Services Ordered: Telecommunications Service  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142532  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$11,936.52  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitment Decision: \$8.00 - 28 Day Waiting Period Violated  
 Funding Commitment Decision Explanation: A contract for a new service was signed prior to the required 28-day waiting period computed from the date of the posting of the Form 470 to the SLD Web Site.

Funding Request Number: 730017 Funding Status: Not Funded  
 SPIN: 143005231 Service Provider Name: Qwest Corporation fka US West Communications  
 Contract Number: SEA-980106-2601  
 Services Ordered: Telecommunications Service  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142532  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$8,079.24  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitment Decision: \$0.00 - 28 Day Waiting Period Violated  
 Funding Commitment Decision Explanation: A contract for a new service was signed prior to the required 28-day waiting period computed from the date of the posting of the Form 470 to the SLD Web Site.

Funding Request Number: 730018 Funding Status: Not Funded  
 SPIN: 143000132 Service Provider Name: Qwest Interprise America, Inc. fka US West Interp  
 Contract Number: SEA-980106-2601  
 Services Ordered: Internal Connections  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142532  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$4,962.00  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitment Decision: \$0.00 - Svc/Discount will NOT be funded  
 Funding Commitment Decision Explanation: Funding cap will not provide for Internal Connections < 82% discount to be funded. Please see [WWW.SL.UN?VERSALSERVICE.ORG](http://WWW.SL.UN?VERSALSERVICE.ORG) for further details

# FUNDING COMMITMENT REPORT

Form 471 Application Number: 202111

Funding Request Number: 730019 Funding Status: Not Funded  
 SPIN: 143000132 Service Provider Name: Qwest Interprise America, Inc. fka US West Inter;  
 Contract Number: SEA-980106-2601  
 Services Ordered: Internal Connections  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142532  
 Billing Account Number: N/A  
 Pre-Discount Amount: 5553.80  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitment Decision: \$0.00 - Srvc/Discount will NOT be funded  
 Funding Commitment Decision Explanation: Funding cap will not provide for Internal  
 Connections < 82% discount to be funded. Please see [WWW.SL.UN?VERSALSERVICE.ORG](http://WWW.SL.UN?VERSALSERVICE.ORG) for  
 further details.

Funding Request Number: 730020 Funding Status: Not Funded  
 SPIN: 143000132 Service Provider Name: Qwest Interprise America, Inc. fka US West Interp  
 Contract Number: SEA-980106-2601  
 Services Ordered: Internal Connections  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142532  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$9,712.08  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitment Decision: \$8.00 - Srvc/Discount will NOT be funded  
 Funding Commitment Decision Explanation: Funding cap will not provide for Internal  
 Connections < 82% discount to be funded. Please see [WWW.SL.UN?VERSALSERVICE.ORG](http://WWW.SL.UN?VERSALSERVICE.ORG) for  
 further details.

Funding Request Number: 730021 Funding Status: Not Funded  
 SPIN: 143000132 Service Provider Name: Qwest Interprise America, Inc. fka US West Interp  
 Contract Number: SEA-980106-2601  
 Services Ordered: Internet Access  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142532  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$2,154.24  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitment Decision: \$0.00 - 28 Day Waiting Period Violated  
 Funding Commitment Decision Explanation: A contract for a new service was signed  
 prior to the required 28-day waiting period computed from the date of the posting of  
 the Form 470 to the SLD Web Site.

Funding Request Number: 730022 Funding Status: Not Funded  
 SPIN: 143002540 Service Provider Name: RT Communications, Inc  
 Contract Number: SEA-980106-2601  
 Services Ordered: Telecommunications Service  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142532  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$7,805.52  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitment Decision: \$0.00 - 28 Day Waiting Period Violated  
 Funding Commitment Decision Explanation: A contract for a new service was signed  
 prior to the required 28-day waiting period computed from the date of the posting of  
 the Form 470 to the SLD Web Site.

# FUNDING COMMITMENT REPORT

Form 471 Application Number: 202111

Funding Request Number: 730023 Funding Status: Not Funded  
 SPIN: 143005231 Service Provider Name: pest Corporation fka US West Communications  
 Contract Number: SEA-380106-2601  
 Services Ordered: Telecommunications Service  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142540  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$8,048.28  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitment Decision: \$8.00 - 28 Day Waiting Period Violated  
 Funding Commitment Decision Explanation: A contract for a new service was signed prior to the required 28-day waiting period computed from the date of the posting of the Form 470 to the SLD Web Site.

Funding Request Number: 730024 Funding Status: Not Funded  
 SPIN: 143005231 Service Provider Name: Qwest Corporation fka US West Communications  
 Contract Number: SEA-360106-2601  
 Services Ordered: Telecommunications Service  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142540  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$2,423.76  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitment Decision: \$8.00 - 28 Day Waiting Period Violated  
 Funding Commitment Decision Explanation: A contract for a new service was signed prior to the required 28-day waiting period computed from the date of the posting of the Form 470 to the SLD Web Site

Funding Request Number: 730025 Funding Status: Not Funded  
 SPIN: 143000132 Service Provider Name: Qwest Enterprise America, Inc. fka US West Interp  
 Contract Number: SEA-980106-2601  
 Services Ordered: Internal Connections  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142540  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$3,102.00  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitment Decision: \$0.00 - Srvce/Discount will NOT be funded  
 Funding Commitment Decision Explanation: Funding cap will not provide for Internal Connections < 82% discount to be funded. Please see WWW.SL.UNIVERSALSERVICE.ORG for further details

Funding Request Number: 730026 Funding Status: Not Funded  
 SPIN: 143000132 Service Provider Name: Qwest Enterprise America, Inc. fka US West Interp  
 Contract Number: SEA-960106-2601  
 Services Ordered: Internal Connections  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142540  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$166.20  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitment Decision: \$8.00 - Srvce/Discount will NOT be funded  
 Funding Commitment Decision Explanation: Funding cap will not provide for Internal Connections < 82% discount to be funded. Please see WWW.SL.UNIVERSALSERVICE.ORG for further details.

# FUNDING COMMITMENT REPORT

Form 471 Application Number: 202111

Funding Request Number: 730027 Funding Status: Not Funded  
 SPIN: 143000132 Service Provider Name: pest Interprise America, inc. fka US West Inter  
 Contract Number: SEA-980106-2601  
 Services Ordered: Internal Connections  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142540  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$8,294.52  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitment Decision: \$8.00 - Srvce/Disnt will NOT be funded  
 Funding Commitment Decision Explanation: Funding cap will not provide for Internal  
 Connections < 82% discount to be funded. Please see [WWW.SL.UN%VERSALSERVICE.ORG](http://WWW.SL.UN%VERSALSERVICE.ORG) for  
 further details.

Funding Request Number: 730028 Funding Status: Not Funded  
 SPIN: 143000132 Service Provider Name: Qwest Interprise America, Inc. fka US West Inter  
 Contract Number: SEA-980106-2601  
 Services Ordered: Internet Access  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142540  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$1,488.96  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitment Decision: \$8.00 - 28 Day Waiting Period Violated  
 Funding Commitment Decision Explanation: A contract for a new service was signed  
 prior to the required 28-day waiting period computed from the date of the posting of  
 the Form 470 to the SLD Web Site.

Funding Request Number: 730029 Funding Status: Not Funded  
 SPIN: 143002540 Service Provider Name: RT Communications, Inc  
 Contract Number: SEA-980106-2601  
 Services Ordered: Telecommunications Service  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142540  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$4,260.24  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitment Decision: \$0.00 - 28 Day Waiting Period Violated  
 Funding Commitment Decision Explanation: A contract for a new service was signed  
 prior to the required 28-day waiting period computed from the date of the posting of  
 the Form 170 to the SLD Web Site.

Funding Request Number: 730096 Funding Status: Not Funded  
 SPIN: 143000132 Service Provider Name: Qwest Interprise America, Inc. fka US West Inter  
 Contract Number: SEA-980106-2601  
 Services Ordered: Internal Connections  
 Earliest Possible Effective Date of Discount: 01/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142483  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$3,102.00  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitment Decision: \$8.00 - Srvce/Disnt will NOT be funded  
 Funding Commitment Decision Explanation: Funding cap will not provide for Internal  
 Connections < 82% discount to be funded. Please see [WWW.SL.UN%VERSALSERVICE.ORG](http://WWW.SL.UN%VERSALSERVICE.ORG) for  
 further details.



# FUNGINC COMMITMENT REPORT

Form 471 Application Number: 202111

Funding Request Number: 730097 Funding Status: Not Funded  
 SPIN: 143000132 Service Provider Name: Quest Interprise America, Inc. fka US West Inter  
 Contract Number: SEA-980106-2601  
 Services Ordered: Internal Connections  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142483  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$7,465.08  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitment Decision: \$0.00 - Srvce/Discount will NOT be funded  
 Funding Commitment Decision Explanation: Funding cap will not provide for Internal  
 Connections < 82% discount to be funded. Please see [WWW.SL.UN?VERSALSERVICE.ORG](http://WWW.SL.UN?VERSALSERVICE.ORG) for  
 further details.

Funding Request Number: 730098 Funding Status: Not Funded  
 SPIN: 143000132 Service Provider Name: Qwest Interprise America, Inc. fka US West Inter  
 Contract Number: SEA-980106-2601  
 Services Ordered: Internet Access  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142483  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$1,436.16  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitment Decision: \$8.00 - 28 Day Waiting Period Violated  
 Funding Commitment Decision Explanation: A contract for a new service was signed  
 prior to the required 28-day waiting period computed from the date of the posting of  
 the Form 470 to the SLD Web Site

Funding Request Number: 730099 Funding Status: Not Funded  
 SPIN: 143002194 Service Provider Name: Sprint/United Telephone Company of the West  
 Contract Number: SEA-980106-2601  
 Services Ordered: Telecommunications Service  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142483  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$5,320.44  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitment Decision: \$0.00 - 28 Day Waiting Period Violated  
 Funding Commitment Decision Explanation: A contract for a new service was signed  
 prior to the required 28-day waiting period computed from the date of the posting of  
 the Form 470 to the SLD Web Site.

Funding Request Number: 730100 Funding Status: Not Funded  
 SPIN: 143005231 Service Provider Name: Qwest Corporation fka US West Communications  
 Contract Number: SEA-960106-2601  
 Services Ordered: Telecommunications Service  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142557  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$17,991.36  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitment Decision: \$8.00 - 28 Day Waiting Period Violated  
 Funding Commitment Decision Explanation: A contract for a new service was signed  
 prior to the required 28-day waiting period computed from the date of the posting of  
 the Form 470 to the SLD Web Site.

# FUNDING COMMITMENT REPORT

Form 471 Application Number 202111

Funding Request Number: 530101 Funding Status: Not Funded  
 SPIN: 143005231 Service Provider Name: Qwest Corporation fka US West Communications  
 Contract Number: SEA-980106-2601  
 Services Ordered: Telecommunications Service  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 112557  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$3,128.76  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitment Decision: \$0.00 - 28 Day Waiting Period Violated  
 Funding Commitment Decision Explanation: A contract for a new service was signed prior to the required 28-day waiting period computed from the date of the posting of the Form C70 to the SLD Web Site.

Funding Request Number: 730102 Funding Status: Not Funded  
 SPIN: 143000132 Service Provider Name: Qwest Enterprise America, Inc. fka US West Interp  
 Contract Number: SEA-980106-2601  
 Services Ordered: Internal Connections  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142557  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$11,604.00  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitment Decision: \$0.00 - Svc/Discount will NOT be funded  
 Funding Commitment Decision Explanation: Funding cap will not provide for Internal Connections < 82% discount to be funded. Please see WWW.SL.UNIVERSALSERVICE.ORG for further details.

Funding Request Number: 730103 Funding Status: Not Funded  
 SPIN: 143000132 Service Provider Name: Qwest Enterprise America, Inc. fka US West Interp  
 Contract Number: SEA-980106-2601  
 Services Ordered: Internal Connections  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142557  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$426.72  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitment Decision: \$8.00 - Svc/Discount will NOT be funded  
 Funding Commitment Decision Explanation: Funding cap will not provide for Internal Connections < 82% discount to be funded. Please see WWW.SL.UNIVERSALSERVICE.ORG for further details.

Funding Request Number: 730104 Funding Status: Not Funded  
 SPIN: 143000132 Service Provider Name: Qwest Enterprise America, Inc. fka US West Interp  
 Contract Number: SEA-980106-2601  
 Services Ordered: Internal Connections  
 Earliest Possible Effective Date of Discount: 07/01/2000  
 Contract Expiration Date: 06/30/2003  
 Site Identifier: 142557  
 Billing Account Number: N/A  
 Pre-Discount Amount: \$2,565.12  
 Discount Percentage Approved by the SLD: N/A  
 Funding Commitment Decision: \$8.00 - Svc/Discount will NOT be funded  
 Funding Commitment Decision Explanation: Funding cap will not provide for Internal Connections < 82% discount to be funded. Please see WWW.SL.UNIVERSALSERVICE.ORG for further details.

FUNDING COMMITMENT REPORT

Form 471 Application Number: 202111

Funding Request Number: 733105      Funding Status: Not Funded  
SPIN: 143002585      Service Provider Name: Union Tel. Co.  
Contract Number: SEA-930106-2601  
Services Ordered: Telecommunications Service  
Earliest Possible Effective Date of Discount: 07/01/2000  
Contract Expiration Date: 06/30/2003  
Site Identifier: 142557  
Billing Account Number: N/A  
Pre-Discount Amount: \$2,454.60  
Discount Percentage Approved by the SLD: N/A  
Funding Commitment Decision: \$6.00 - 28 Day Waiting Period Violated  
Funding Commitment Decision Explanation: A contract for a new service was signed prior to the required 28-day waiting period computed from the date of the posting of the Form 470 to the SLD Web Site

**OPEN FILE MEMO**

FILE NO.: 0500 -- 02 - 02 061

FILE NAME: E-Rate Year 3

ATTORNEY: Don Gerstein

DATE: February 20, 2002

DIVISION: Admin Law

SECTION: Education

COURT & DOCKET NO.:

AGENCY: Funding

NATURE OF THE CASE:  
ISSUES:

\* This should include type of case and any other information  
pertinent to this case.

---

---

TO BE COMPLETED BY FILE CLERK:

DATE FILE OPENED: 2-21-02

NAME OF FILE CLERK. M. A. Scurran



**JUDY CATCHPOLE**  
Superintendent of Public Instruction



**Wyoming**  
Department of Education

April 11, 2002

Letter of Appeal  
Schools and Library Division  
Box 125-Correspondence Unit  
80 South Jefferson Road  
Whippany, NJ 07981

APR 11 2002

DEC 11 2002

**A. Contact Information**

Linda Carter, Director  
Data and Technology Unit  
Wyoming Department of Education  
Hathaway Building, Second Floor  
2300 Capitol Avenue  
Cheyenne, WY 82002  
(307) 777-6252 (voice)  
(307) 777-6234 (fax)  
lca, tel@state.wy.us

**B. Identity of SLD Funding Letter Under Appeal**

Funding Commitment Decision Letter  
(Funding Year 3: 07/01/2000 - 06/30/2001)  
February 11, 2002  
Applicant: State of Wyoming, Department of Administration and Information  
Form 471 Application Number: 202111  
Billed Entity Number: 154794

**THIS LETTER IS AN APPEAL.**



Hathaway Building, Second Floor  
2300 Capitol Avenue  
Cheyenne, WY 82002-0050

Phone 307-777-7673  
FAX 307-777-6234  
E-mail: [info@www.k12.wy.us](mailto:info@www.k12.wy.us)  
Website: [www.k12.wy.us](http://www.k12.wy.us)

Today

Tomorrow



Together

### C. Funding Request Numbers That Are Subject of **Appeal**

729606	729731	729830	729992
729607	729732	729841	729993
729611	729736	729842	729994
729619	729737	729863	729996
729626	720738	729864	730000
729631	729739	729865	730001
729632	729744	729869	730002
729633	729745	729870	730003
729634	729746	729871	730004
729663	729764	729896	730007
729664	729765	729898	730008
729665	729766	729919	730009
729666	729770	729520	730010
729670	729771	729521	730014
729671	729774	729922	730015
729672	729775	729926	730016
729689	729783	729949	730017
729693	729784	729950	730021
729694	729785	729954	730022
729695	723786	729955	730098
729696	729790	729956	730099
729723	729797	729961	730100
729724	729798	729982	733101
729728	723793	729966	730105
729729	729003	729987	
729730	729829	729388	

### D. Explanation of **Appeal**

The State of Wyoming appeals the denial of funding for the above referenced Funding Request Numbers based on the following language appearing in the Funding Commitment Report for each number:

“Funding Commitment Decision: \$0.00 - 28 Waiting Period Violated”

“Funding Commitment Decision Explanation: A contract for new service was signed prior to the required 28-day waiting period computer from the date of the posting of the Form 470 to the SLD Web Site ”

The conclusion stated in the explanation is inaccurate at best. The service for which funding support is sought exists as provided by the State Department of Education pursuant to judicial and legislative mandates. The process the School and Library Division required for seeking funds through the posting of a Form 470 for each of these requests overlooked that under state

Letter of Appeal  
Schools and Library Division  
April 11, 2002  
Page 3

law competitive bidding was not required for those requests because of these mandates and the FCC mandate that the competitive bid requirements "are not intended to preempt state or local requirements." 47 CFR § 54.504

The requests for funds were intended to provide support for each school district's use of the Wyoming Equality Network ("WEN"). The WEN is a statewide, high-speed data and video network that connects all Wyoming public schools. Some background on the genesis of the WEN may be of assistance in understanding how the service the WEN provides falls under the FCC's preemption prohibition.

The development of the WEN arose as a result of the Wyoming Supreme Court's decision in *Campbell Co. School District v. Wyoming*, 907 P.2d 1238 (Wyo. 1995), which found that, *inter alia*, that the Wyoming Constitution required an "equal opportunity for a proper education" for the children of the state. 907 P.2d at 1278. To help address this mandate, the Wyoming State Legislature in 1997 enacted legislation to require the State Superintendent of Public Instruction to cooperate with interested parties to develop and implement a statewide education technology plan. 1997 Session Laws of Wyoming, Chapter 65, Section 1. W.S. § 21-2-202(a)(xx). The Legislature directed the Governor and State Superintendent to establish a committee to prepare a request for proposals for a statewide network allowing for data transmission in every school building and two-way video capability to the high school;. 1997 Session Laws of Wyoming, Chapter 50, Section 1.

On April 3, 1998, Wyoming Governor Jim Geringer and State Superintendent Judy Catchpole signed the Master Agreement for Technology in Education with US West. US West has since become Qwest Communications. The Agreement provided for "services to be furnished by [US West] to provide telecommunications capabilities to schools and related entities for the creation of a telecommunications network within the state of Wyoming." Master Agreement for Technology in Education Project for the State of Wyoming, ¶ 1.1. The term of the contract ran from July 1, 1998 through June 20, 2003. A subsequent amendment to the contract allowed for the term to be extended for up to an additional 36 months provided that Qwest met certain milestones related to upgrading communication capabilities in designated parts of Wyoming.

The contract included an "Availability of Funds" clause. This is a standard provision in all state contracts recognizing that a long term contract cannot bind a future state legislature to a commitment. This clause states in pertinent part:

Each payment obligation of the State is conditioned upon the availability of government funds which are appropriated or allocated for the payment of this obligation. If funds are not allocated and available for the continuance of the



law competitive bidding was not required for those requests because of these mandates and the FCC mandate that the competitive bid requirements "are not intended to preempt state or local requirements." 47 CFR § 54.504

The requests for funds were intended to provide support for each school district's use of the Wyoming Equality Network ("WEN"). The WEN is a statewide, high-speed data and video network that connects all Wyoming public schools. Some background on the genesis of the WEN may be of assistance in understanding how the service the WEN provides falls under the FCC's preemption prohibition.

The development of the WEN arose as a result of the Wyoming Supreme Court's decision in *Campbell Co. School District v. Wyoming*, 907 P.2d 1238 (Wyo. 1995), which found that, *inter alia*, that the Wyoming Constitution required an "equal opportunity for a proper education" for the children of the state 907 P.2d at 1278. To help address this mandate, the Wyoming State Legislature in 1997 enacted legislation to require the State Superintendent of Public Instruction to cooperate with interested parties to develop and implement a statewide education technology plan. 1997 Session Laws of Wyoming, Chapter 65, Section 1. W.S. § 21-2-202(a)(xx). The Legislature directed the Governor and State Superintendent to establish a committee to prepare a request for proposals for a statewide network allowing for data transmission in every school building and two-way video capability to the high schools. 1997 Session Laws of Wyoming, Chapter 80, Section 1

On April 3, 1998, Wyoming Governor Jim Geringer and State Superintendent Judy Catchpole signed the Master Agreement for Technology in Education with US West. US West has since become Qwest Communications. The Agreement provided for "services to be furnished by [US West] to provide telecommunications capabilities to schools and related entities for the creation of a telecommunications network within the state of Wyoming." Master Agreement for Technology in Education Project for the State of Wyoming, ¶ 1.1. The term of the contract ran from July 1, 1998 through June 20, 2003. A subsequent amendment to the contract allowed for the term to be extended for up to an additional 36 months provided that Qwest met certain milestones related to upgrading communication capabilities in designated parts of Wyoming.

The contract included an "Availability of Funds" clause. This is a standard provision in all state contracts recognizing that a long term contract cannot bind a future state legislature to a commitment. This clause states in pertinent part:

Each payment obligation of the State is conditioned upon the availability of government funds which are appropriated or allocated for the payment of this obligation. If funds are not allocated and available for the continuance of the

services performed by USWCS ,the Agreement may be terminated by the State at the end of the period for which the funds are available. The State shall notify USWCS at the earliest possible time of the services which will or may be affected by a shortage of funds. No penalty shall accrue to the State in the event this provision is exercised, and the State shall riot be obligated or liable for any future payments due or for any damages as a result of termination under this section. This provision shall not be construed to permit the State to terminate **this** Agreement in order to acquire similar services from another party. . . .

**Master Agreement for Technology in Education, ¶ 14.8 (emphasis added)**

In 1998, the Legislature appropriated \$14.7 million for the project. 1998 Session Laws of Wyoming, Chapter 30, § 205

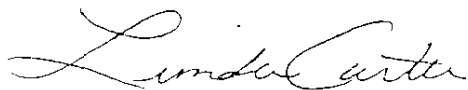
Thus, the WEN is mandated by the Wyoming Supreme Court and State Legislature. The contract under which Qwest provides services for the WEN has been properly executed. If the Form 470 process were to require competitive bidding for provision of these services for each funding year, it would undercut the integrity of the State contracting and procurement process, at a minimum require the State to consider violating the covenant of good faith that is inherent in all contracts, and most importantly, preempt state law. The only proper avenue for terminating the WEN contract is through non-appropriation of funding by the state legislature. The Form 470 process attempts to usurp this legislative function and preempt state law. Preemption of state laws is expressly forbidden in the the FCC rules. 47 CFR § 54.504(a). Furthermore, the FCC rules allow for long term contracts such as the WEN. 47 CFR § 507(e).

The funding decisions on the Year 3 request illustrate the inconsistent manner that the School and Library Division has responded to the State's funding requests. Those funding requests for all Years 2, 3, and 4 are based on the same WEN contract and the same circumstances, yet for each funding year the result was different. The School and Library Division approved funding for Year 2 requests. In Year 4, some of the requests were approved based upon dares of Form 470s and Memoranda of Agreements. In Year 3, no funding requests were approved. The State finds it difficult to comprehend why Year 3 requests for school districts that qualified for Year 4 funding were denied despite the facts and circumstances being same for each district for both years. Attachment A is a chart showing the Year 3 and Year 4 FRNs falling into this category. These inconsistencies indicate that the processes used to determine approval of funding requests is arbitrary and capricious, an abuse of discretion and not in accordance with law. While Wyoming maintains that all funding requests under appeal should be funded, at the very least, the Year 3 funding for whose Year 4 companion requests were funded should likewise be funded.

Letter of Appeal  
Schools and Library Division  
April 11, 2002  
Page 5

The State has made every attempt to comply with the requirements imposed on it by the School and Library Division staff for acquiring E-Rate funding for WEN services. However, in imposing those requirements, state law was ignored in contravention of FCC rules. Therefore, the State requests that the Funding Requests be reexamined with the proper consideration given to state law and that the Funding Requests be granted.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Linda Carter".

Linda Carter  
Department of Education

A handwritten signature in cursive script, appearing to read "Donald Gerstein".

Donald Gerstein  
Senior Assistant Attorney General  
Wyoming Attorney General's Office

# Attachment A

## District FRNs Not Funded in Year 3

Big Horn #1	729612
	729613
	729617
	729618
Campbell #1	729673
	729674
	729678

	729682
Carbon #1	729683
	729687
	729688
	729697
Converse #1	729698
	729702
Coverse #2	729703
	729704
Fremont #38	729791

Johnson #1	729804
	729822
	729826
	729828

	729834
Laramie #2	729835
	729839
	729840

	729879
	729880
	729881
	729884

Niobrara #1	729885
	729886
	729890
Park #4	729891
	729892

	729927
Sheridan #1	729928
	729932
	729936
Sheridan #2	729937
	729939

	729941
	729942
	729947

	729941
	729942
	729947

	729941
	729942
	729947

## District FRNs Funded in Year 4

Big Horn #1	512253	617943
	515112	
	515172	
	514369	
Campbell #1	512282	569147
	518041	618066
	563089	

	512284	618094
Carbon #1	515126	
	518049	
	566393	
	512316	530735
Converse #1	518055	559771
	520245	569132
Coverse #2	512318	530741
	520247	560181
Fremont #38	512895	

Johnson #1	512910	569303
	515154	610596
	518062	618354
	566285	

	512919	569336
Laramie #2	515158	610605
	518133	614095
	536566	618406

	513195	560194
	518170	569379
	520251	
	530773	

Niobrara #1	513197	569396
	518004	618517
	566633	

Park #4	513203	569406
	566179	618536

	513210	569434
Sheridan #1	518230	618837
	566301	
	513214	618866

Sheridan #2	518233	
	566331	

	518193	569303
	518193	569303
	569303	569303

618155

569149

626659

	729943
	729957
	729958
Subline #0	729962
	729963
	729964
	729965
Structure #1	729966
	729970
	729971
	729972
Teton #1	729976
	729980
	730023
Weston #7	730024
	730028
	730029

	569442
	518227 619036
	518227 619032
Subline #0	518228
	569445
	619034
	518229 619036
Structure #1	518229 619036
	518222
	569440
	518231 619030
Teton #1	660206
	569483
	519964
Weston #7	515166
	518210
	660537

2





Administrator's Decision on Appeal - Funding Year 2000-2001

October 21, 2002

Linda Carter  
State of Wyoming, Dept. of Administration and Information  
Hathaway Building, 2<sup>nd</sup> Floor  
2300 Capitol Avenue  
Cheyenne, WY 82002

Re:

Billed Entity Number:

154794

471 Application Number:

202111

Funding Request Number(s):

729606, 729607, 729611, 729619, 729626,  
729631, 729632, 729633, 729634, 729663,  
729664, 729665, 729666, 729670, 729671,  
729672, 729689, 129690, 729694, 729695,  
729696, 729723, 729724, 729728, 729729,  
729730, 729731, 729732, 729736, 729737,  
729738, 729739, 729744, 729745, 729746,  
729764, 729765, 729766, 729770, 729771,  
729774, 729775, 729783, 729784, 729785,  
729786, 729790, 729797, 729798, 729799,  
729803, 729829, 729830, 729841, 729842,  
729863, 729864, 729865, 729869, 729870,  
729871, 729896, 729898, 729919, 729920,  
729921, 729922, 729926, 729949, 729950,  
729954, 729955, 729956, 129981, 729982,  
729986, 729987, 729988, 729992, 729993,  
729994, 729996, 730000, 730001, 730002,  
730003, 730004, 730007, 730008, 730009,  
730010, 730015, 730016, 730017,  
730021, 730022, 730098, 730099, 730100,  
730101, 730105

Your Correspondence Dated: April 11, 2002

After thorough review and investigation of all relevant facts, the Schools and Libraries Division ("SLD") of the Universal Service Administrative Company ("USAC") has made its decision in regard to your appeal of SLD's Year Three Funding Commitment Decision for the Application Number indicated above. This letter explains the basis of SLD



decision. The date of this letter begins the GO-day time period for appealing this decision to the Federal Communications Commission ("FCC"). If your letter of appeal included more than one Application Number, please note that for each application for which an appeal is submitted, a separate letter is sent.

Funding Request Number, 729606, 729607, 729611, 729619, 729626, 729631, 729632, 729633, 729634, 729663, 729664, 729665, 729666, 729670, 729671, 729672, 729689, 729690, 729694, 729695, 729696, 729723, 729724, 729728, 729729, 729730, 729731, 729732, 729736, 729737, 729738, 729739, 729744, 729745, 729746, 729764, 729765, 729766, 729710, 729771, 729114, 729775, 729783, 729183, 129785, 729186, 729790, 729797, 729798, 729799, 729803, 129829, 129830, 729841, 729842, 729863, 729864, 729865, 729869, 729870, 729871, 729896, 729898, 729919, 729920, 729921, 729922, 729926, 729949, 729950, 729954, 129955, 729956, 729987, 729988, 729992, 729993, 729994, 729996, 730000, 730001, 730002, 730003, 730004, 730007, 730008, 730009, 730010, 730014, 730015, 730016, 730017, 730021, 730022, 730098, 730099, 730100, 730101, 730105

Decision on Appeal	Denied in full
Explanation	

- In your letter of appeal you have explained that the reason these funding requests were denied was because the 28-day waiting period ~~was~~ violated. You have stated that this conclusion is inaccurate. The service for which support is being requested exists as provided by the State DOE pursuant to judicial and legislative mandates. The SLD requirement of Form 470 posting overlooks State law, which does ~~not~~ require competitive bidding, and the FCC mandates that the competitive bid requirements "are not intended to preempt state or local requirements". *You* further state that the "Wyoming Education Network has been mandated by the State Supreme Court and State Legislature", and that the contract under which Qwest provides services has been properly executed. If the Form 470 process were to require competitive bidding for these services each Funding Year, it would undercut the integrity of the State contracting and procurement process. You have also argued that the SLD has responded to the State's funding requests in an inconsistent manner as they have received full funding in FY 1999, partial funding in FY 2001, and no funding in FY 2000. You find it difficult to comprehend that FY 2000 requests for school districts that were approved in FY 2001 were denied when the circumstances were the same for both funding years. You then state that these inconsistencies indicate that the SLD's processes are arbitrary and capricious, an abuse of discretion, and not in accordance with law. You maintain that while all funding requests under appeal should be funded, at the very least, the Funding Year 2000 funding requests whose Funding Year 2001 companion requests were funded should likewise be funded. You have noted that every attempt has been made to comply with the SLD's requirements for acquiring funding for these services. However, in imposing these requirements, state law was ignored. The State requests that these funding requests be

reexamined with proper consideration given to state law, and that the requests be granted

- Upon thorough review of the appeal, it was determined that all FRN's under appeal were correctly denied for violating the competitive bidding requirement. On appeal you have not disputed that the State Contract was signed without competitive bidding, but have argued that state law does not require competitive bidding and that state law should override the program rules of the SLD. *You* have cited the FCC (47 CFR 54.504) in stating that the competitive bid requirements "are not intended to preempt state of local requirements". However, the complete statement "These competitive bid requirements apply **in addition** to state and local competitive bid requirements and are not intended to preempt state of local requirements" clearly indicates the FCC's intention that while the SLD's program rules are not intended to replace state and local requirements, they are to be adhered to in addition to those requirements. *You* have also argued that if the Form 470 process were to require competitive bidding of these services each funding year, it would undercut the integrity of the State contracting and procurement process. Program rules do not require multi-year contracts to be posted for bid in each funding year of the contract. Program rules do require that the requested services be posted to the SLD website for competitive bid, and all proposals reviewed before entering into an agreement with a service provider. As per the SLD website, the Form 470 used to post ~~For~~ competitive bid can then be used for the life of the contract.
- You have further argued that the SLD has reviewed your Form 471 applications inconsistently as you have received full funding in Funding Year 1999, partial funding in Funding Year 2001, and no funding in Funding Year 2000. You find it difficult *to* comprehend that Funding Year 2000 requests for school districts that were approved in Funding Year 2001 were denied when the circumstances were the same for both funding years. You have requested that if the appeal is denied that the SLD fund the Funding Year 2000 funding requests that correspond to the approved Funding Year 2001 FRN's. However, the SLD's records indicate that the Contract Award Dates for approved FRN's on your Funding Year 2000 Form 471 differ from those on your Funding Year 2001 Form 471. The SLD's records verify that you were contacted on 1/15/2002 and at that time confirmed that the Contract Award Dates and corresponding Form 470 numbers were correct. As the SLD is not permitted to accept information on appeal that was not made available during initial review, this request cannot be granted.
- Your funding requests have been denied for violating the 28-day competitive bidding requirement. On appeal you have not disputed that you entered into a contract before posting this service for competitive bid, but have argued that program rules do not take precedence over state procurement requirements. **As** the FCC has consistently ruled that the competitive bidding requirement must be

followed, and you have failed to provide evidence that you have complied with this requirement, the appeal is denied.

- You signed a contract for new services prior to the expiration of the 28-day posting period. FCC rules require that except under limited circumstances, all Forms 470 received be posted on the website for 28 days, and that applicants carefully consider all bids received before selecting a vendor, entering into an agreement or signing a contract, and signing and submitting a Form 471. *See* 47 C.F.R. §§ 54.504: 54.511(a), (c). FCC rules further require that the Administrator send the applicant a confirmation when the Form 470 has been posted, and inform the applicant of the date after which the applicant may sign a contract with the vendor it selects. *See* 47 C.F.R. § 54.504(b)(4). These competitive bidding requirements help ensure that applicants receive the lowest pre-discount price from vendors. *See Federal-State Joint Board on Universal Service*. CC Docket No. 96-45, Order on Reconsideration, 12 FCC Rcd 10055, 10098 ¶ 5 (1997). New services include tariff telecommunications services that are NOT subject to an existing, binding, written contract.

If you believe there is a basis for further examination of your application, you may file an appeal with the Federal Communications Commission (FCC) via United States Postal Service: FCC, Office of the Secretary, 445-12<sup>th</sup> Street SW, Washington, DC 20554. If you are submitting your appeal to the FCC by other than United States Postal Service, check the SLD web site for more information. Please reference CC Docket Nos. 96-45 and 97-21 on the first page of your appeal. The FCC must **RECEIVE** your **appeal WITHIN 60 DAYS OF THE ABOVE DATE ON THIS LETTER** for your appeal to be filed in a timely fashion. Further information and new options for filing an appeal directly with the FCC can be found in the "Appeals Procedure" posted in the Reference Area of the SLD web site, [www.sld.universalservice.org](http://www.sld.universalservice.org).

We thank you for your continued support, patience, and cooperation during the appeal process.

Schools and Libraries Division  
Universal Service Administrative Company